STATEMENT OF BASIS

Westvaco Corporation
Laurel, Maryland

EPA ID No. MDD048005839

I. Introduction

This Statement of Basis is for the Westvaco Corporation facility in Laurel, Maryland . After a thorough site inspection of the facility and an evaluation of past environmental practices, the Environmental Protection Agency (EPA) believes that no further corrective action is necessary at the facility at this time. The purpose of this document is to solicit public comment on the proposal that no further corrective action is required at the facility at this time.

The Westvaco Corporation site has been designated a high priority facility in the Resource Conservation and Recovery Act (RCRA) corrective action program. (For more information on the RCRA Corrective Action Program, visit the Region III web site at www.epa.gov/reg3wcmd/correctiveaction.htm) The corrective action program is designed to ensure that facilities have investigated and cleaned up any releases of hazardous waste or constituents that may have occurred at their property. Region III is using the administrative procedures found in 40 CFR Part 270 to solicit public comment prior to making its final corrective action decision for the Westvaco facility.

II. Facility Background

The Westvaco facility is located on Johns Hopkins Road approximately one-half mile west from Highway 29, in Laurel, Maryland. Westvaco constructed a facility and began conducting paper manufacturing research and development on this former farmland in 1966. Operations at this facility have consisted of paper coating research, development and testing. Research and development activities generally consist of the application, development and testing of various aqueous chemical coatings. From the facility↘s initial start-up in 1966 until 1989, all lab and septic wastes were directed to a drain field south of the plant buildings. Septic wastes were directed into the northern section of the drain field and the lab wastes were directed into a storage tank system consisting of three above ground storage tanks, transfer piping and infiltration wells that allowed lab waste flows to percolate into the upper soils region via several dry wells. In 1984, Westvaco installed several infiltration trenches at approximately 10 feet below the ground surface to function in conjunction with the dry wells.

In February 1989, the three above ground storage tanks, piping, infiltration trenches, and

dry wells were removed. The facility began sending all discharge flows to the city sewer at this time and obtained supply water from the local utility system. Prior to this time the facility had used water supplied by two production wells on the property. These two production wells revealed volatile organic contamination during sampling events conducted in 1986 and 1987. At present, usage of water from the two water supply wells is limited to tank storage for fire protection measures.

III. Description of Areas of Concern with a description of known and/or potential releases.

There are two areas of interest that were identified based on previous investigations at the Westvaco facility, including an inspection conducted by EPA Region III on June 19, 2001. The two areas that EPA determined needed further investigation are: 1) the former on-site production wells, and 2) the on-site leach field, (See attachment 1 for locations).

Tetrachloroethene (PCE) at 7.0 ug/l and chloroform at 3.2 ug/l had been identified above their respective Risk Based Concentrations (RBCs) of 1.1 ug/l and 0.15 ug/l in on-site production wells from sampling events in 1986 and 1987. In addition, analytical results of samples collected from settling tanks during the 1989 removal of the on-site drain field effluent disposal system revealed the presence of several volatile organic chemicals. There was some concern that these compounds may have been discharged to the groundwater underlying the leach field; however, no groundwater samples had been collected from this area. The former leach field was re-developed into a storm water retention pond that is currently used by the facility.

IV. Site Investigation and Evaluation

In order to assess the current groundwater quality at the facility, Westvaco conducted a sampling event in March 2002. Four temporary monitoring wells (TMW) were installed around the former leach field using hollow stem auger drilling. The wells were completed about ten feet below the water table at depths ranging from 22 feet to 40 feet below existing grade. Groundwater samples were collected from the four temporary wells using the low-flow method. A groundwater sample was also collected from one of the production wells (Well #5). This sample was collected from a spigot at the well head located prior to the check valve. All samples were analyzed for Target Compound List (TCL) Volatile Organic Compounds (VOCs). The temporary wells around the former leach field were also analyzed for dissolved cadmium and lead.

An environmental consulting firm conducted the sampling activities for Westvaco. EPA Region III utilized personnel from the Army Corps of Engineers (ACE), Baltimore Office to

provide oversight of the sampling event and to collect split samples. Analytical results from this event revealed no lead or cadmium in any of the groundwater samples. The analytical results provided by Westvaco↘s consultant revealed a low concentration of chloroform (1ug/l) in the production well and in TMW #1, located on the up-gradient side of the former leach field. Acetone (3ug/l) was detected in TMWs #3 and#4. Analytical results from the split samples collected by the ACE revealed chloroform (1.2 ug/l) and tetrachloroethene (0.8 ug/l) in the production well. Chloroform (1.3 ug/l) was also detected in TMW#1 in the split sample collected by ACE. The only other positive detection in the split samples collected by ACE was chloromethane (1.2 ug/l) found in TMW #3. It should be noted that a duplicate sample collected by the ACE at this location revealed no contamination. The only contaminant identified in this sampling event that exceeded a risk based concentration (RBC) is chloroform. The RBC for chloroform is .15 ug/l. A few detections of chloroform (up to 1.3 ug/l) were found in samples from the production well and the upgradient TMW #1. No chloroform was found in the TMWs downgradient of the leach field. Furthermore, chloroform is regulated with the group of compounds referred to as trihalomethanes, and this group has a Maximum Contaminant level (MCL) of 100 ug/l. Chloroform was the only trihalomethane found in on-site groundwater. Therefore, the 1.3 ug/l of chloroform found in groundwater from the site is well below the MCL (100ug/l) for this compound group. Based on the topography in the area of the facility, groundwater is expected to flow to the south and discharge into Hammond Branch located adjacent to the facility property. No residential properties were identified immediately south of the site during the investigation conducted by EPA. Based on the fact that the results of the groundwater sampling did not reveal any contaminant exceeding MCLs, no further RCRA corrective action is necessary at this site at this time.

V. Public Participation

EPA is requesting comments from the public on its proposal that no corrective action will be required at this facility at this time. The public comment period will last forty-five (45) calendar days from the date that this matter is publicly noticed in a local newspaper (November 15, 2002 to December 30, 2002). Comments may be sent to EPA in writing at the EPA address listed below, and all commenters will receive a copy of the final decision and a copy of the response to comments.

A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Bill Wentworth of the EPA Regional Office at the address below or at (215)814-3184.

All information considered by EPA when making this proposal to not require corrective action at this facility is available and may be examined. This information is available at the following locations:

U.S. Environmental Protection Agency
Region III
1650 Arch Street - 3WC23
Philadelphia, PA 19103-2029

Contact: Mr. William Wentworth
Voice: (215) 814-3184
Fax: (215) 814-3113
Hours: Mon-Fri, 9:00 A.M. - 5:00 P.M.
E-mail: wentworth.william@epa.gov (ASCII text only)

Howard County Library
9525 Durness Lane
Laurel, MD 20723
(410) 880-5975
Contact : Ms. Karen Trennepohl - Library Manager
Hours: Mon. - Thurs., 9:30 A.M. - 9:00 P.M.
Fri. - Sat., 9:30 A.M. - 5:30 P.M.
Sun. - 1:00 PM - 5:00 PM

Following the forty -five (45) calender day public comment period, EPA will prepare a final decision which will address all written comments and any substantive comments presented verbally at a public meeting. If the comments are such that significant changes are made to the proposal that no further action is needed at this time at this facility, EPA will seek public comments on the revised proposal.